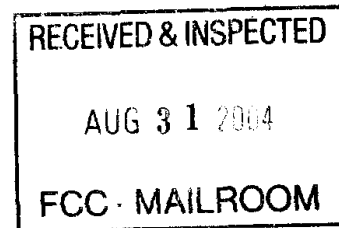


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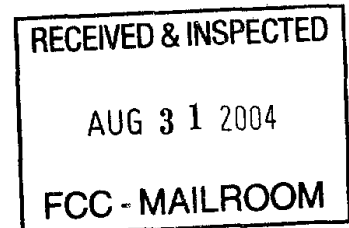
"Improve the economic well-being of agriculture and enrich the quality of farm family life."

August 31, 2004

FAX TO: Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary

SUBJECT: Comments in the Matter of Broadcast Localism
MB Docket No. 04-233

4 pages including cover*



** Please contact Amanda Beasley @ 309-557-3366 if you do not receive all pages.*



ILLINOIS AGRICULTURAL ASSOCIATION[®]

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Before the
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In the Matter of:

Broadcast Localism

MB Docket No. 04-233

Comments of the Illinois Farm Bureau

Pursuant to 47 C.F.R. §§ 1.415 and 1.419, the Illinois Farm Bureau (IFB) submits these comments in response to the FCC's Notice of Inquiry released July 1, 2004 concerning Broadcast Localism. IFB commends the Commission for its efforts to examine the role played by broadcast radio in serving the public interest and will direct these remarks to a communications issue of vital importance to our membership: the serious decline in agricultural news programming and information services on radio.

Illinois Farm Bureau is our state's largest farm organization with over 400,000 member families. Farm Bureau's public policy positions are developed at the grassroots level to ensure that they reflect the views of our rural membership.

As a part of the American Farm Bureau Federation, IFB strongly supports AFBF's member-written policy with respect to broadcast media, which demonstrates the importance of this issue to rural, agricultural communities: "To make vital decisions, farmers and ranchers need detailed and timely weather information, local news, up-to-the-minute market reports and news affecting production agriculture. We encourage all radio and television stations to maintain and improve their agricultural services."

Trends in radio today are moving in the opposite direction from our stated policies. Instead of improving and maintaining their agricultural services, many radio stations are eliminating or curtailing farm news, weather and market information. According to figures supplied by the National Association of Farm Broadcasters, the number of on-air broadcasters in the NAFB has declined to 136, down from 225 in 1998. In Illinois during the same period the number of farm broadcasters dropped from 21 to 16.

Recently, WGN Chicago, the single most important agricultural station in Illinois, cut its farm programming. The WGN Noon show (agriculture and business) was reduced from 40 minutes of news to brief market updates.

This trend is disturbing to us, but it can be readily explained. Our review of the problem identified several factors. In the late 1990s, large ownership groups acquired hundreds of radio licenses following changes in media ownership rules. In some states,

this consolidation has lead to wholesale dismissal of staff members at individual stations and production of programs at one headquarters station or corporate office.

National farm advertising has dropped 45 percent in the last five years. Local farm advertising declined even earlier. The declines can be attributed to a weaker farm economy, a consolidation of farm industry companies and fewer new product offerings, especially in the crop protection area.

Newspaper accounts of the changes at WGN, and other radio stations noted the decline in advertising dollars. Station managers and program directors also were quoted as saying they felt a need for programming that appealed to a wider audience, and they believed that farmers could get the same information elsewhere.

IFB recognizes there are other sources for commodity market and weather information, including subscription-based, satellite-delivered information services and a small number of web sites. In fact, IFB has been an innovator in developing information services for farmers. IFB developed the FarmDayta broadcast service that grew to 35,000 customers nationally. We also have a web site for farm news, markets and weather that reaches 70,000 people each day, and a publication, FarmWeek, that has a circulation of 88,000.

Despite all this communications effort, we know that farmers are mobile during their workday and have always relied heavily on radio because it can follow them anywhere. Research shows that in many areas of the country, farm radio remains a valued, useful source of information for producers.

Our summary of the problem is this: the decline in advertising dollars to support farm radio has made it vulnerable. Unless station managers and owners have a strong commitment to their rural audience, the drop in revenue is a convenient excuse to remove farm programming. As a result, broadcasters are not serving the interests and needs of their rural communities.

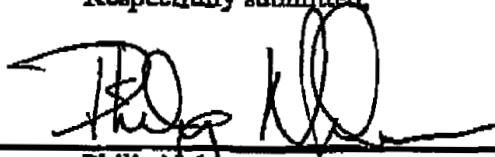
At the national, state and county level, Farm Bureau is doing what it can to support farm broadcasting. IFB is purchasing advertising only from radio stations with farm programming. And IFB and the Ohio Farm Bureau Federation are working with AFBF to develop an awareness campaign regarding the plight of farm broadcasting as well as encouraging letters to radio stations from farmers and ranchers.

While an urban listener may have many stations to choose from on AM and FM and can find the format that suits his or her interests, that is not the case in rural areas. There are fewer stations and those that exist may be part of the same ownership group. And as pointed out earlier, the 50,000-watt stations that once were important to rural listeners now are abandoning those listeners.

In conclusion, IFB recognizes the market forces affecting radio, and the role they play in the decline of farm broadcasting. However, market forces should not be the sole

factor in determining how the public's information needs are served. If the FCC intends to encourage more community-responsive radio programming, IFB strongly urges the FCC to include farm programming in that initiative.

Respectfully submitted,



8.31-04

Philip Nelson
President
Illinois Farm Bureau
P.O. Box 2901
Bloomington, Illinois 61701

August __, 2004

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Attachments

CC: Peter Dorn

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